



NW Natural, DEQ Comments on the Draft Groundwater SCMs Design

BAYUK Dana

to:

Bob Wyatt

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4 Attachments



Gasco Draft Final Design Report Comments (30-June-2011).docx



Letter to DEQ-Corps Cmts on GASCO GW Source Control Design-16Jun11.pdf



NWN-Revised_Interim_Design-Specific_Comments-22Sept11.pdf NWN-Revised_Interim_Design-General_Comments-22Sept11.pdf



Hello Bob.

DEQ reviewed the "Draft Groundwater Source Control Final Design Report, NW Natural Gasco Site" dated May 2011 (Draft Groundwater SCMs Report). Soft copies of our comments letter and attachment are provided below.

In addition, soft copies of EPA's comments and the ACOE's letter are attached.

A signed hard copy of DEQ's letter and attachments will be sent to you via regular mail this week.

The Draft Groundwater SCMs Design proposes designs for groundwater source control measures (SCMs) along the shoreline of the property owned by NW Natural and the northern portion of the property owned by Siltronic Corporation. The primary purpose of the attached letter is to inform NW Natural that based on our review of the document, DEQ:

- Acknowledges the principal elements of groundwater source control are presented in the document, including SCMs designs for the Fill WBZ and Alluvium WBZ;
- Accepts the Draft Groundwater SCMs Design as the Revised Interim Design Report;
- Does not accept the Revised Interim Design Report as a 100% design document (i.e., a construction-ready submittal); and
- Approves NW Natural moving forward with the final groundwater SCMs design process for the Fill WBZ interceptor trench and the Alluvium WBZ HC&C system along shoreline segments 1 and 2.

The next step in the final groundwater SCMs design process is for NW Natural to prepare and submit the Draft Final Groundwater SCMs Design for DEQ review and approval that: 1) incorporates the groundwater SCMs design information, evaluations, and modifications indicated by DEQ; and 2) responds to EPA and DEQ comments. The Draft Final Groundwater SCMs Design and response to comments should be submitted to EPA and DEQ for review within 45 days of NW Natural's receipt of the attached comments.

DEQ acknowledges the work NW Natural performed to develop a SCM design for the Fill WBZ and redesign the HC&C system along the portion of Segment 1 where DNAPL occurs.

Please feel free to contact me with questions regarding this e-mail and/or attachments.

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